

SEP 17 2024

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO. 3:24-CR-190-KDB
)	
)	<u>BILL OF INDICTMENT</u>
v.)	
)	Violations:
)	21 USC § 841(a)(1)
)	18 USC § 924(c)(1)(A)
RODNEY REGAN DUNHAM)	18 USC § 922(g)(1)
_____)	

THE GRAND JURY CHARGES:

COUNT ONE

(Possession with Intent to Distribute Cocaine and Cocaine Base)

On or about March 5, 2024, in Mecklenburg County, within the Western District of North Carolina,

RODNEY REGAN DUNHAM

did knowingly and intentionally possess with intent to distribute quantities of cocaine and cocaine base, more commonly known as “crack cocaine,” both Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about March 5, 2024, in Mecklenburg County, within the Western District of North Carolina,

RODNEY REGAN DUNHAM

did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Controlled Substances, a violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count One.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE
(Possession of Firearm by Felon)

On or about March 5, 2024, in Mecklenburg County, within the Western District of North Carolina,

RODNEY REGAN DUNHAM

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, that being, a Sig Sauer, Model P229 Elite, .40 cal. semi-automatic pistol.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

a. a Sig Sauer, Model P229 Elite, .40 cal. semi-automatic pistol and ammunition seized from **RODNEY REGAN DUNHAM**'s person in the parking lot of the Extended Stay America hotel at 6035 Tyvola Glen Circle in Charlotte, North Carolina on March 5, 2024.

A TRUE BILL:



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY


THOMAS KENT
ASSISTANT UNITED STATES ATTORNEY